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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

ZHIGUO LIN,

Case No. 2:21-cv-02096-RFB-DJA

Plaintiffs,

vs.

**Unopposed Motion to Extend Discovery
(Third Request)**

UNITED STATES OF AMERICA,

Defendants.

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), as well as LR IA 6-1, LR 26-3, Plaintiff hereby moves to extend discovery cut off and subsequent deadlines by 120 days. Counsel have conferred, and Defendant does not object to a 90-day extension of discovery. This is the third request for an extension.

This case arises from a car accident between Plaintiff and a United States Postal Service Letter Carrier on February 5, 2020, in a parking lot at or near 3545 South Decatur Boulevard, Las Vegas, Nevada. Plaintiff alleges negligence against the United States.

A. Request for Extension of Remaining Discovery Deadlines

1. Discovery and other matters completed to date

a. The parties served their initial disclosures.

b. On October 5, 2022, Defendant served on Plaintiff a first set of Interrogatories and Requests for Production of Documents.

c. On October 5, 2022, Defendant requested signed HIPAA authorizations from Plaintiff.

d. Beginning on October 11, 2022, Defendant requested Plaintiff's availability for his deposition, and Defendant has asked for the language/dialect needed for a translator, e.g., Mandarin, Cantonese.

e. On December, 9, 2022, Defendant served a first supplement to its initial disclosures.

f. On February 13, 2023, Plaintiff served responses to Defendant's first set of Interrogatories and Requests for Production of Documents, as well as served an executed HIPAA.

g. On May 31, 2023, Defendant took the deposition of Plaintiff.

h. On June 25, 2023, Defendant took the deposition of witness Feng Lin, Plaintiff's son.

2. Discovery that remains to be completed

a. The parties are conferring about available deposition dates for Defendant's driver whom had had multiple scheduling issues arise.

b. Any and all other discovery that may be appropriate and applicable under the rules.

3. Reasons why discovery has not been completed

The parties have been attempting to schedule the deposition of Defendant Driver whom has given dates but then has scheduling issues arise before the dates can be agreed upon by all parties. Further difficulty has arisen with the schedules of counsel for both parties and their caseload.

As such, Plaintiff requests, and Defendant does not oppose a 90 day extension of the discovery in this matter.

4. Proposed revised discovery schedule

A 90-day extension of the remaining deadlines in the case would result in the following revised discovery schedule:

	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Discovery Cut Off	July 25, 2023	October 23, 2023
Dispositive Motions	August 25, 2023	November 27, 2023

Joint Pretrial Order

September 27, 2023

December 26, 2023

By: /s/ Dominic C. Vasquez
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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: July 18, 2023